

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

SIMONE E. PHOENIX,	:	
<i>Plaintiff</i>	:	
v.	:	
	:	C.A. No. 1:20-cv-152-MSM-PAS
CARLA CUELLAR, et al.	:	
<i>Defendants</i>	:	

PLAINTIFF'S MOTION TO ENLARGE TIME TO RESPOND TO THE COURT'S TEXT ORDER  
INVITING BRIEFING RESPONSIVE TO *THOMPSON V. CLARK*

NOW COMES Plaintiff Simone Phoenix and respectfully asks this Court to enlarge her time by **one week** to file the memorandum allowed pursuant to the Court's text order of April 6, 2022. Unless the Court grants an extension of time, any briefing the parties which to submit is due **Wednesday, April 20, 2022**. Plaintiff seeks to file her response on or before **Wednesday, April 27**.

Plaintiff would suggest that should the Court grant this extension, that it be available to any other party intending to provide briefing in response to the Order. Municipal Defendants have already filed a memorandum in response to the order, ECF 72.

Respectfully submitted,

Plaintiff, **SIMONE E. PHOENIX**  
By her attorney,

Date: April 20, 2022

/s/ Shannah Kurland

**Shannah Kurland, Esq.** (#9186)  
149 Lenox Avenue  
Providence, RI 02907  
Phone: (401) 439-0518  
skurland.esq@gmail.com

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused this Response to be filed through the Court's CM/ECF system, where it is available for public viewing and shall be noticed to counsel for all defendants on this 20th day of April, 2022:

Paul Callaghan, Esq.  
*pcallaghan@hcc-law.com*

Tyler Pare, Esq.  
*tpare@hcc-law.com*

Rajaram Suryanarayan  
*rsury@gunninglafazia.com*

Michael Colucci, Esq.  
*mjc@olenn-penza.com*

Michael Calise, Esq.  
*mcalise@providenceri.gov*

/s/ Shannah Kurland  
Shannah Kurland